

In the Matter of:)
)
Comments regarding MM Docket No. 99-25)
)
submitted by:)
Radio Training Network, Inc.)
P.O. Box 7217)
Lakeland, FL)

RTN is the non-commercial licensee of several full power NCE stations and numerous FM translator stations. Many of the FM translators RTN utilizes provide or extend coverage in fringe service areas of RTN's full power NCE stations, as well as provide service in some major markets. Many of these FM translators were applied for and built at the direct request of listeners. Any loss of RTN's FM translator service would be very disappointing for many thousands of RTN's listeners. RTN's translators attract a significant following: by way of example, the Arbitron Fall 2004 cumulative for W208AR, Lake Placid, FL and W214BA, Sebring, FL was 6,000 individuals; for W244BE, Brandon, FL was 15,600 individuals; and for W291AG, Highland City, FL, W254AI, Auburndale, FL, and W24AK, Lakeland, FL was 22,000 individuals. In short, LPFM's should not be allowed to disrupt this service.

RTN strongly opposes any notion that a LPFM application should be treated as having “primary” status to prior-filed FM translator applications and authorized FM translator stations. The impact of the FM translators that RTN utilizes demonstrates that such translators have a dynamic impact on the communities that they serve. See Exhibit 1 (a selection of e-mails from listeners who are served by RTN translators). Further, the concept proposed in Section 25 of MM Docket No. 90-25, would in effect substitute a service, i.e., FM translator stations, that have a proven track record, with a service, i.e., LPFM stations, that do not have a proven track record. Such a substitution of an unproven service receiving “primary” status over FM translators is not in furtherance of the public-interest.

The argument that LPFM’s should be provided “primary” status over FM translators because they provide programming for the local public is a fallacy, which is highlighted by the fact that there are no restrictions on a LPFM from utilizing programming that is not locally originated and the fact that Section 15 of MM Docket No. 90-25 anticipates and seeks comments regarding loosening the ownership rules regarding LPFM’s, such that an entity could hold the licenses for a group of LPFMs.

At the very least, the existing construction permits and licenses issued for FM translators should be grandfathered, if the Commission is inclined to provide “primary” status to LPFMs over FM translators. RTN’s loyal listeners have faithfully donated and underwritten the costs to apply for construction permits and build out the facilities for translators. Such a displacement of FM translators would undergird the public trust of the many who have donated their time and money to NCE radio stations and translators, by snatching away a service that provides a proven track-record of public benefit to many.

Respectfully submitted

Radio Training Network, Inc.
By Counsel

GAMMON & GRANGE, P.C.

A handwritten signature in dark ink, appearing to read 'A. Wray Fitch III', is written over a horizontal line.

A. Wray Fitch III
Timothy R. Obitts
8280 Greensboro Drive
Seventh Floor
McLean, VA 22102
(703) 761-5000

From: \

Sent: Saturday, March 19, 2005 2:19 PM

To: TheJoyFM

Cc: ,

Subject: Thank you

I want to take the time to thank you for such a wonderful station that we listen to all the time. On March 3rd my 2 year old son had open heart surgery and the songs that you played on the radio that morning before we got to the hospital made us feel the peace we needed and know that God wanted us to hear what was being played that morning. His surgery was a success and 4 days later he got to come home after the doctors said it would be a week or 2 before he got to leave. We know that it was God's love and all of our family, church family, and friends that prayed so much for our son God answered all of our prayers. God is just so good to us all. I just wanted you to know how much this station uplifted us in our time of need. Thank you again.

The Bartow Florida

-----Original Message-----

From:

let]

Sent: Tuesday, May 10, 2005 3:04 PM

To: Bill Harrier

Subject: My mistake...

Bill; This is from , Sebring. Just a while ago

(today) I posted an upcoming event to your calendar. I mistakenly posted the wrong address and, even though the addresses are just across the street from each other, I don't want to cause undue confusion. The correct address for the Kidz Blitz on May 21 is 200 E. Center Ave., not the one I indicated when I submitted our event. Thanks so much for what you are doing to assist our church families in reaching our communities for Christ.

P.S. On a personal note, I have been listening to The Joy FM since about 1987. You folks helped my finish raising my 2 children after my divorce, gave me inspiration when I was looking for a ministry (I had decided to try clown ministry but couldn't decide on a clown name, until I turned on the radio and the song started playing called "I choose Joy". So, my clown name was JOY!!!), and comforted me when I lost my Mom, you rejoiced with me when God sent me my new husband (we've been married 8 years now). So, just a note to say thanks for being there. I love you all.

Jim,

It's painful to read these emails from people who are having a problem receiving our signal from the Charleston translators. However, it shows how important the translators are to them.

Our Spring 05 came numbers for the translators we have direct numbers for total 36,900. That's 15,100 from Charleston and 21,800 from Raleigh. Other translators you see listed provide a vital link to populated areas even if they don't directly cover a large population. Also, in many cases they extend the coverage to populated areas on the fringe or in dead spots of our primary coverage.

These translators provide a service that can't be duplicated by LPFMs. Many of our translators were placed as a direct request from listeners to provide service in areas on the fringe of our primary coverage. The loss of this translator service would be very disappointing for these listeners. These translators provide an important service to thousands of listeners who depend on them every day. LPFMs should not be allowed to disrupt this service.

Your First Name: ~

Your Last Name:

Email: ~~~~~

Comment: I love the work you all are doing. I never listened to Christian music till I started to listen to 91.9 here in the Charleston area. Now this is all I listen to. Praise God. Now do you know when the Dove Awards are going to be on Pax tv?

Your First Name: ~

Your Last Name:

Email:

Comment: First of all let me say that I love "HIS RADIO" it is wonderful. I just hate the fact that I live in Charleston SC, and the reception is not that good. I do not listen to any other music but Christian and we really need better reception down here. THANKS

Your First Name: ~

Your Last Name:

Email:

Comment: My wife and I really enjoy HIS! I am on staff at a church in Mt. Pleasant (Charleston) and I want to get the word out to the church family about HIS. What can I do? Do you have stickers or some of the color brochures like I received at the Avalon Concert? I just want to spread the JOY. Thanks